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10 Attorneys for Defendant

11 COMMONWEALTH LAND TITLE INSURANCE COMPANY

12 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 BANK OF NEW YORK MELLON,

18 Plaintiff,

19 vs.

20 COMMONWEALTH LAND TITLE
INSURANCE COMPANY et al.,

21 Defendants.

22 Case No.: 2:22-CV-00341-RFB-NJK

23 **STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

24 **FIRST REQUEST**

25 COMES NOW defendant Commonwealth Land Title Insurance Company

26 (“Commonwealth”) and plaintiff Bank of New York Mellon (“BONY”), by and through their
respective attorneys of record, which hereby agree and stipulate as follows:

27 1. On February 11, 2022, BONY filed its complaint in the Eighth Judicial District
Court for the State of Nevada;

1 2. On February 23, 2022, Commonwealth removed the instant case to the United
2 States District Court for the State of Nevada (ECF No. 1);

3 3. Commonwealth's response to BONY's complaint is currently due on March 22,
4 2022;

5 4. Counsel for Commonwealth request a 30-day extension of Commonwealth's
6 deadline to respond to BONY's complaint, through and including Thursday, April 21, 2022 to
7 afford Commonwealth's counsel additional time to review and respond to BONY's complaint.

8 5. Counsel for BONY does not oppose the requested extension;

9 6. This is the first request for an extension made by counsel for Commonwealth,
10 which is made in good faith and not for the purposes of delay.

11 7. This stipulation is entered into without waiving any of Commonwealth's
12 objections under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Commonwealth's deadline to respond to the complaint is
2 hereby extended through and including Thursday, April 21, 2022.

3 Dated: March 20, 2022

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
COMMONWEALTH LAND TITLE
INSURANCE COMPANY

8 Dated: March 20, 2022

WRIGHT FINLAY & ZAK, LLP

10 By: /s/-Lindsay D. Dragon

11 LINDSAY D. DRAGON
12 Attorneys for Plaintiff
BANK OF NEW YORK MELLON

13 **IT IS SO ORDERED.**

14 Dated March 21, 2022.

15 
16 NANCY J. KOPPE
17 UNITED STATES MAGISTRATE JUDGE